

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:)	
)	Chapter 11
W.R. GRACE & CO., <i>et al.</i> , ¹)	
)	Case No. 01-01139 (KG)
Reorganized Debtors.)	Jointly Administered
)	
)	Re: 929575, 32825, 32826, 32827, 32828, 32829,
)	32837, 32838, 32845, 32851, 32856, 32857 and
		32860

**JOINT NOTICE OF COMPLETION OF BRIEFING REGARDING (I) THE
REORGANIZED DEBTORS' MOTION FOR SUMMARY JUDGMENT FOR PARTIAL
ALLOWANCE AND PARTIAL DISALLOWANCE OF CLAIM NO. 7021 AND (II)
NORFOLK SOUTHERN RAILWAY COMPANY'S CROSS-MOTION FOR SUMMARY
JUDGMENT ALLOWAING CLAIM NO. 7021**

PLEASE TAKE NOTICE THAT pursuant to Rule 7007-4 of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware, W.R. Grace & Co ("W.R. Grace") and Norfolk Southern Railway Company ("Norfolk"), by and through their undersigned counsel, hereby advise the Court that briefing on the (I) *Reorganized Debtors' Motion for Summary Judgment Pursuant to Fed. R. Bankr. P. 7056 for Partial Allowance and Partial Disallowance of Claim No. 7021* and (II) *Norfolk Southern Railway Company's Cross-Motion for Summary Judgment Allowing Claim No. 7021* (the "Motions") is now complete.

PLEASE TAKE FURTHER NOTICE that below is a list of pleadings concerning the Motions and corresponding docket numbers. Counsel is submitting a joint binder to the Court with a copy of each of the following pleadings:

¹ The Reorganized Debtors are W. R. Grace & Co. (f/k/a Grace Specialty Chemicals, Inc., or "Grace") and W. R. Grace & Co.-Conn. ("Grace-Conn.")

Date	Docket No.	Pleading	Tab
10/13/16	929575	<p>[Reorganized Debtors'] Motion for Summary Judgment Pursuant to Fed. R. Bankr. P. 7056 for Partial Allowance and Partial Disallowance of Claim No. 7021, Filed by Norfolk Southern Railway Company</p> <ul style="list-style-type: none"> • Memorandum in Support of the Reorganized Debtors' Motion for Summary Judgment Pursuant to Fed. R. Bankr. P. 7056 for Partial Allowance and Partial Disallowance of Claim No. 7021, Filed by Norfolk Southern Railway • Proposed Findings of Uncontested Facts in Support of the Reorganized Debtors' Motion for Summary Judgment Pursuant to Fed. R. Bankr. P. 7056 for Partial Allowance and Partial Disallowance of Claim No. 7021, Filed by Norfolk Southern Railway 	1 A B
1/27/17	32825	Norfolk Southern Railway Company's Cross-Motion for Summary Judgment Allowing Claim No. 7021	2
1/27/17	32826	Norfolk Southern Railway Company's (I) Answering Brief in Opposition to Reorganized Debtors' Motion for Summary Judgment Pursuant to Fed.R.Bankr.P. 7056 for Partial Allowance and Partial Disallowance of Claim No. 7021 and (II) Opening Brief in Support of Norfolk Southern's Cross-Motion for Summary Judgment	3
1/27/17	32827	Declaration of Thomas Wesley Conley in Support of Norfolk Southern Railway Company's (I) Answering Brief in Opposition to Reorganized Debtors' Motion for Summary Judgment Pursuant to Fed.R.Bankr.P. 7056 for Partial Allowance and Partial Disallowance of Claim No. 7021 and (II) Opening Brief in Support of Norfolk Southern's Cross-Motion for Summary Judgment	4
1/27/17	32828	Declaration of Christopher John Sharpe in Support of Norfolk Southern Railway Company's (I) Answering Brief in Opposition to Reorganized Debtors' Motion for Summary Judgment Pursuant to Fed.R.Bankr.P. 7056 for Partial Allowance and Partial Disallowance of Claim No. 7021 and (II) Opening Brief in Support of Norfolk Southern's Cross-Motion for Summary Judgment	5

Date	Docket No.	Pleading	Tab
1/27/17	32829	Declaration of R. Stephen McNeill in Support of Norfolk Southern Railway Company's (I) Answering Brief in Opposition to Reorganized Debtors' Motion for Summary Judgment Pursuant to Fed.R.Bankr.P. 7056 for Partial Allowance and Partial Disallowance of Claim No. 7021 and (II) Opening Brief in Support of Norfolk Southern's Cross-Motion for Summary Judgment	6
3/8/17	32837	[Reorganized Debtors'] Motion to Strike the Sharpe and Conley Declarations	7
3/8/17	32838	[Reorganized Debtors'] Omnibus Memorandum in Support of Granting the Reorganized Debtors' Summary Judgment Motion, Denying Norfolk Southern's Cross-Motion and Disallowing Norfolk Southern's Indemnification Claim	8
3/31/17	32845	[Reorganized Debtors'] Motion for an Order Barring the Kirkland Testimony in FELA Action as Hearsay Evidence	9
4/11/17	32851	Norfolk Southern Railway Company's Reply Brief (I) in Support of Norfolk Southern's Cross-Motion and (II) in Response to the Reorganized Debtors' Motion to Strike the Sharpe and Conley Declarations	10
4/13/17	32856	Request for Oral Argument Regarding Norfolk Southern Railway Company's Cross-Motion for Summary Judgment Allowing Claim No. 7021	11
4/14/17	32857	Norfolk Southern Railway Company's Objection to Motion for an Order Barring the Kirkland Testimony in FELA Action as Hearsay Evidence	12
4/24/17	32860	[Reorganized Debtors'] Reply on Grace's Motion for an Order Barring the Kirkland Testimony in FELA Action as Hearsay Evidence	13

PLEASE TAKE FURTHER NOTICE that the parties intend to provide the Court with a status of these matters at the hearing scheduled for **May 3, 2017 at 11:00 a.m. (Prevailing Eastern Time)** before the Honorable Kevin Gross at the United States Bankruptcy Court for the District of Delaware, 824 North Market Street, 6th Floor, Courtroom 3, Wilmington, Delaware 19801

Dated: April 25, 2017
Wilmington, Delaware

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